

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
) CRIMINAL NO. 04-10373-MLW
v.)
)
ERIC MOLIGNARO)
)

JOINT STATUS CONFERENCE MEMORANDUM

The United States of America, by Assistant U.S. Attorney Ann Taylor, and the defendant Eric Molignaro, by counsel Miriam Conrad, Esq., jointly submit this memorandum. The parties address herein the issues delineated in L.R. 116.5(A)(1)-(A)(7).

1. The government anticipates the disclosure of the computer hard drive in this matter, as soon as the terms of the protective order, which are presently being disputed by the parties, are determined by the Court. The government does not anticipate any additional discovery with the exception of that due at least twenty-one days prior to trial pursuant to L.R. 116.2(B)(2)(a)-(g), but allows that it might do so in response to specific defense requests.

2. A motion date should be established under Fed. R. Crim. P. 12(c). The defendant requests that a date be set after discovery is complete.

3. The parties agree that the time between the date of the filing of this memorandum, April 27, 2005, through the date that the Court sets for the filing by the defendant of motions, up to and including the date that the Court sets for the government's response thereto, should be excluded pursuant to 18 U.S.C. § 3161(h)(1)(F).

4. At this juncture, the parties anticipate a trial, which is expected to last approximately one week.

5. An interim status conference should be set coincident with the conclusion of the briefing period that the Court sets for the defendant's motions.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Ann Taylor
Ann Taylor
Assistant U.S. Attorney

ERIC MOLIGNARO
Defendant

By: /s/ Miriam Conrad
Miriam Conrad
Counsel for Eric Molignaro

DATE: April 27, 2005